

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GLEN CRAIG

Plaintiff,

-against-

GETTY IMAGES (U.S.), INC., CNN AMERICA
INC., NBCUNIVERSAL MEDIA, LLC,
AMERICAN BROADCASTING COMPANIES,
INC., CBS NEWS, INC., FOX NEWS NETWORK,
LLC, MSNBC CABLE L.L.C., BBC
WORLDWIDE AMERICAS, INC.,
CONDÉ NAST ENTERTAINMENT LLC,
HEARST COMMUNICATIONS, INC.,
PROMETHEUS GLOBAL MEDIA, LLC,
ROLLING STONE LLC, TIME, INC.,
THE NEW YORK TIMES COMPANY,
BLOOMBERG L.P., NEW YORK
DAILY NEWS COMPANY, OATH, INC.
INFINITY 1 INCORPORATED and
REDBUBBLE, INC.

Civil Case No. 17-CV-9916 (AJN)

Defendants.
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PLAINTIFF’S MOTION
FOR LEAVE TO FILE A FIRST AMENDED COMPLAINT

Pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, Plaintiff Glen Craig (“Plaintiff”) respectfully submits this Motion for Leave to File a First Amended Complaint. In support hereof, Plaintiff shows the Court as follows:

1. Plaintiff moves the Court for leave to file a first amended complaint.
2. As set out more fully in Plaintiff’s Memorandum of Law in Support of Plaintiff’s Motion for Leave to File a First Amended Complaint and the Declaration of John Pelosi, Esq., Plaintiff should be granted leave to file the amended complaint. Under Rule 15(a), there is a

strong presumption in favor of permitting amendment, and there is no reason to depart from that presumption here.

3. No party will be prejudiced by the proposed amendment.

PRAYER

For these reasons, and those set out in the Memorandum of Law in Support of Plaintiff's Motion for Leave to File a First Amended Complaint and the Declaration of John Pelosi, Esq., Plaintiff requests that the Court grant it leave to file its First Amended Complaint.

Dated: August 19, 2018

/s/ John Pelosi

John Pelosi, Esq.

Angelo DiStefano, Esq.

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